

Economy Telephone, Inc.
Annual 47 C.F.R. 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for calendar year 2008.

Name of company covered by this certification: Economy Telephone, Inc.

Form 499 Filer ID: 808750

Name of signatory: Tom Williams

Title of signatory: General Manager

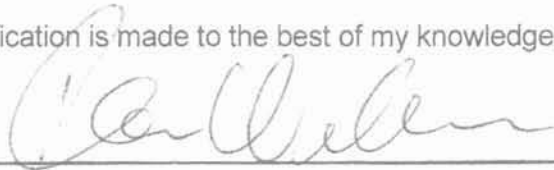
I, Tom Williams, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not received any customer complaints in the past year concerning the authorized release of CPNI. The Company has not taken any actions (proceedings instituted petitions filed at either state commissions, the court system, or at the Commission) against to brokers in the past year. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company are taking to protect CPNI are described in the attached statement that summarizes the Company's internal procedures for compliance with the Commission's CPNI rules.

This certification is made to the best of my knowledge, information and belief.

Signed: _____



Dated: _____

02-28-09

**Statement Regarding
Customer Proprietary Network Information ("CPNI")
Procedures**

Economy Telephone, Inc, ("Economy Telephone" or "Company") is committed to protecting the privacy of its subscribers' confidential and proprietary information and has established internal procedures to protect CPNI. The following statement explains the internal procedures of Economy Telephone to ensure that it is in compliance with the Federal Communications Commission's ("Commission's") CPNI rules.

I. CPNI Protections

- A. Call Detail Records ("CDRs").** Economy Telephone does not disclose CDR information over-the-phone, unless the subscriber can identify the CDR information (e.g., time, date, and the terminating telephone number of a call). In such instances, Economy Telephone will assist the subscriber only with regard to the CDR information identified and will not release any other CDR information.
- B. Non-CDR CPNI.** For each subscriber, Economy Telephone maintains a list of authorized contacts for release of non-CDR CPNI. Non-CDR CPNI is only provided to authorized contacts listed on the subscriber's account.
- C. Invoices.** If a subscriber has misplaced an invoice (which contains both CDR and non-CDR information), Economy Telephone will send another copy of the invoice to the subscriber's address of record upon oral request by the subscriber.
- D. On-Line.** Economy Telephone does not provide access to any CPNI on-line.
- E. On-Site.** Economy Telephone does not provide access to any CPNI on-site at the Company's offices, and it does not have any retail locations.

II. Required Disclosures

- A. Account Changes.** Economy Telephone notifies a subscriber immediately when an address of record (postal or electronic) is created or changed. This does not include the initial creation of the account. The notification is through a Economy Telephone-originated voicemail to the telephone number of record, or by mail to the address of record. The notification does not provide the updated information. The Company does not utilize passwords or make available any subscriber on-line accounts.
- B. Disclosures to Designated Persons.** Economy Telephone will disclose CPNI upon affirmative written request by the subscriber to any person designated by the subscriber. All such requests for CPNI must be verified and approved by management before disclosing the requested CPNI.
- C. Breach Notification.** Within 7 days of a reasonable determination of breach (i.e., CPNI disclosed to a third party without subscriber authorization), Economy Telephone will notify the US Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni. After 7 days of USSS and FBI notice, if Economy Telephone has not received written direction from the USSS or the FBI, Economy Telephone will notify the subscriber of the breach, unless the USSS and the FBI have extended the period for such notice. For 2 years following USSS and FBI notice, Economy Telephone will maintain a record of (1) discovered breaches; (2) notifications to the USSS and the FBI; (3) USSS and FBI

responses; (4) dates breaches discovered; (5) dates Economy Telephone notified the USSS and the FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

III. CPNI Permitted Uses

- A. Service Provision and Billing.** Economy Telephone permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to initiate, render, bill, and collect for its services.
- B. Protection of Rights, Property or Users.** Economy Telephone permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to protect the rights or property of the service provider, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- C. Telemarketing, Referral or Administrative Services.** Economy Telephone permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to provide any inbound telemarketing, referral, or administrative services to the subscriber for the duration of the call, if such call was initiated by the subscriber and the subscriber approves of the use of such CPNI to provide such service.
- D. Provision of CPE and Other Non-Telecom Services.** Economy Telephone permits the use and disclosure of, and access to CPNI for purpose of providing carrier premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion, and to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

IV. CPNI Marketing Uses

- A. Total Service Approach.** Economy Telephone uses, discloses, and permits access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the subscriber already purchases from Economy Telephone, without subscriber approval. Economy Telephone does not use, disclose or permit access to CPNI for the purpose of marketing any additional services outside of the category of services to which the subscriber already purchases from Economy Telephone.
- B. Third Parties.** Economy Telephone does not share the CPNI of a subscriber with any affiliate or third party for purposes of marketing any services.

V. Training, Recordkeeping and Enforcement

- A. Training.** Economy Telephone employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.
- B. Marketing Campaign Records.** Economy Telephone maintains a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to GPM. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.
- C. Outbound Marketing Supervisory Review.** Economy Telephone maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for subscriber approval.
- D. Enforcement.** It is the policy of Economy Telephone to seek to employ appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.